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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

DELPHI CORPORATION, et al.,

Chapter 11  
Case No. 05-44481 (RDD)  
(Jointly Administered)

Debtors.

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**CREDITORS' FIRST SET OF INTERROGATORIES**

The Creditors H.E. Services Company and Robert Backie [hereinafter referred to as Creditors] in the above-captioned cases, by and through their attorneys, request that Debtors respond to all interrogatories set forth pursuant to the Order Pursuant to 11 USC 502 (b) and Fed.R. Bank. P. 2002 (m), 3007, 7016, 7026, 9006, 9007 and 9014 Establishing (i) Dates for Hearings Regarding Objections to Claims and (ii) Certain Notices and Procedures Governing Objections to Claims.

Debtors means Delphi, its affiliated debtors and debtors and debtors-in-possession and/or any of its predecessor(s) or successor(s) in interest, parent corporations, subsidiaries, affiliates and other related entities, owners, officers,

directors, employees, agents and beneficiaries, including attorneys, consultants and independent contractors.

H.E. Services Company also includes H.E. Services Engineering and Testing, Universal Tool, Universal Inspection, Universal Manufacturing, and an Ancon Prototype & Machine. H.E. Services also includes its facilities in Saginaw, Flint and El Paso, Texas.

Documents include, but are not limited to, the transmittal of information of any kind, in any form and by any means.

1. Identify each and every document in support of Debtors' factual assertions (as set forth in ¶9-12 of Debtors' Supplemental Reply) including, but not limited to, every person with knowledge of each document, and the substance of each document.
2. Identify each and every document in support of Debtors' factual assertions (as set forth in ¶13-18 of Debtors' Supplemental Reply) including, but not limited to, every person with knowledge of each document, and the substance of each document.
3. Identify each and every document in support of Debtors' factual assertions (as set forth in ¶19-27 of Debtors' Supplemental Reply) including, but not limited to, every person with knowledge of each document, and the substance of each document.
4. Identify each and every document in support of Debtors' factual assertions (as set forth in ¶28 of Debtors' Supplemental Reply) including, but not

limited to, every person with knowledge of each document, and the substance of each document.

5. Identify each and every person with knowledge as to Debtors' factual assertions as referenced in each of the preceding interrogatories along with the substance of each person's knowledge.
6. Identify each and every policy pertaining to minority suppliers.
7. Identify each and every communication between the Debtors and Creditors regarding Creditors' Flint Facility (leading up to the opening of the facility and after the facility was opened) including, but not limited to, every person with knowledge of each Communication, and the substance of each Communication.
8. Identify each and every communication between the Debtors and Creditors and between Debtors and EX-CELL-O GmbH regarding the Ex-Cello Grinding Machine including, but not limited to, every person with knowledge of each Communication, and the substance of each Communication.
9. Identify each and every communication between the Debtors and Creditors regarding the invoices and purchase orders which have been attached to Creditors' Supplemental Response including, but not limited to, every person with knowledge of each Communication, and the substance of each Communication.

10. Identify each and every communication between Delphi and the Claimants regarding Creditors' Minority Status, including, but not limited to, every person with knowledge of each communication, and the substance of each Communication.
11. Identify each and every document pertaining to orders made to Prince Manufacturing, Alma Contech Manufacturing and Mariah Manufacturing Company for "lower column bracket assemblies", "diamond size and assembly pump housings", "machine shift tubes", "machine PLT 2 aluminum side covers", "press pins to support housing", "machine sides 600 gear side covers", "assembly lock modules", "assembly of tilt housings" and "attainment of lock modules" including, but not limited to, every person with knowledge of each Communication, and the substance of each Communication.

Dated: April 23, 2007

Respectfully submitted,

THE MASTROMARCO FIRM

s/ Victor J. Mastromarco, Jr.

Victor J. Mastromarco, Jr. (P34564)

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**CERTIFICATE OF SERVICE**

Victor J. Mastromarco, Jr. being duly admitted to practice before the  
Southern District of New York, certifies that on the 23<sup>rd</sup> day of April 2007, I  
caused service of the Interrogatories to be served by e-mail and U.S. Mail upon:

Skadden, Arps, Slate, Meagher & Flom  
Four Times Square  
New York, New York 10036  
Attn: Kayalyn A. Marafioti, Esq.  
Thomas J. Matz, Esq.

Skadden, Arps, Slate, Meagher & Flom  
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Albert L. Hogan, III, Esq.  
John K. Lyons, Esq.  
Ron E. Meisler, Esq.

Dated: April 23, 2007

s/ Victor J. Mastromarco, Jr.  
Victor J. Mastromarco, Jr. (P34564)